

**NL INDUSTRIES/TARACORP SUPERFUND SITE GROUP**  
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April 1, 2021

**By Electronic Mail and First Class Mail**

Ms. Sheri L. Bianchin  
 Remedial Project Manager  
 Institutional Controls Coordinator  
 U.S. Environmental Protection Agency Region 5  
 77 West Jackson Boulevard (SR-6J)  
 Chicago, IL 60604

**Re: NL Industries/Taracorp Superfund Site; Granite City, Illinois**  
**Consent Decree – Quarterly Progress Report 61 (January-March 2021)**

Dear Ms. Bianchin:

As required by the Consent Decree for the NL Industries/Taracorp Superfund Site (the “site”), two copies of this letter are submitted, on behalf of the NL Industries/Taracorp Superfund Site Group (“Group”), to provide the U.S. Environmental Protection Agency (“EPA”) with a quarterly progress report for activities performed during the period from January-March 2021.

**1. Actions Taken During Previous Quarter to Comply with the Consent Decree:**

- **Institutional Controls:** During the January-March 2021 period, the Group continued to perform title searches for use with 10 draft environmental covenants, including the draft environmental covenants for the 1555 State Street property; the Unknown Road (Taracorp) property; the [REDACTED] Non-responsive [REDACTED]; the Taracorp pile property; the Mayco (Illinois), LLC property; the Terminal Railroad Association property; the U.S. Carriers Inc. property; the Transload Realty property; and the [REDACTED] Non-responsive [REDACTED]
- **Petition for Partial Deletion:** During the January-March 2021 period, the Group continued to prepare a petition for partial deletion. The Group submitted its Petition for Partial Deletion from the National Priorities List to EPA on March 30, 2021.
- **Remote Fill Properties:** During the January-March 2021 period, the Group initiated efforts to prepare an outline/protocol for soil sampling on several remote fill properties.
- **Operation and Maintenance:** During the January-March 2021 period, the Group’s project coordinator continued to prepare a revised Operation and Maintenance Plan to update the Group’s 2002 Operation and Maintenance Plan. In addition, the following operation and maintenance activities were performed at the site:

January 4	The Group's project coordinator sent an email and letter to EPA to provide an updated certificate of insurance for the Group's lawn maintenance contractor, Munie Greencare Professionals ("Munie").
January 19	The Group's project coordinator sent an email to Munie to request additional information related to Munie's proposal for 2021 lawn maintenance services for the Taracorp pile and 1555 State Street properties.
March 10	The Group's project coordinator sent an email to Munie to provide the Group's authorization for Munie to perform vegetation control and mowing services on the properties at 16 <sup>th</sup> and State Street (including the Taracorp pile cap) in 2021.

- **Project Coordination:** During the January-March 2021 period and in addition to items previously noted, the Group's project coordinator performed the following work related to the site:

January 4	Sent an email and letter to EPA to provide Johnson Controls International PLC's Form 10-K to satisfy the Group's financial assurance requirements pursuant to the Consent Decree
January 6	Submitted Quarterly Progress Report 60 to EPA.
January 13	Sent an email to EPA's project manager to request additional information related to three properties previously remediated by EPA and to be included in the Group's Petition for Partial Deletion from the National Priorities List.
February 22	Sent an email to Illinois EPA to respond to a request for tax parcel identification numbers for the five remote fill properties that are subject to institutional controls.
February 24	Sent an email and property drawings to EPA to attempt to confirm the location of the Sand Road 2 property, previously remediated by EPA.
March 24	Sent an email to EPA's project manager to respond to an inquiry and provide an update on the Group's efforts to prepare a Petition for Partial Deletion and an outline for potential soil sampling on five remote fill properties.
March 30	Sent an email and letter to EPA to provide the Group's Petition for Partial Deletion from the National Priorities List.

## 2. Summary of Data and/or Results of Sampling and Tests Received:

- Not applicable for this reporting period.

## 3. Work Plans, Plans, and Other Deliverables Completed and Submitted to EPA During the Previous Quarter:

- As indicated above, the Group submitted its Petition for Partial Deletion from the National Priorities List to EPA in March 2021.

**4. Actions, Data Collection, and Implementation of Work Plans and Other Information Related to the Progress of Construction which are Scheduled to be Performed During the Next Six-Week Period:**

- The Group will continue to perform operation and maintenance activities at the site, as required. As part of those activities, the Group will continue to prepare an updated operation and maintenance plan.
- The Group will continue to perform title searches, as part of efforts to finalize environmental covenants.
- The Group will address comments and questions, if any are received from EPA, on the Petition for Partial Deletion from the National Priorities List, which was submitted to EPA in March 2021.
- The Group will continue to prepare a draft outline/protocol for soil sampling for several remote fill properties. The draft document will be submitted to EPA upon completion.
- The Group will address comments, if any are received, on the draft administrative records, draft notices of soil contamination, and draft notices of potential soil contamination for 15 denied access residential properties that were submitted to EPA and Illinois EPA in September 2019 and October 2020.
- The Group anticipates that additional discussions will occur with the Venice attorney in regard to the Venice roadways ordinance.
- The Group will continue to monitor All Pallet Services' efforts to repair the fence along the south side of the Taracorp pile.
- The Group will continue to address EPA's comments, update the Institutional Controls Work Plan, and implement institutional controls as the scope of institutional controls activities are finalized.
- The Group will address comments, if any are received from EPA, in regard to the Five-Year Review Groundwater Monitoring Report, which was submitted to EPA in February 2019 to document the results of the November 2018 groundwater monitoring event.
- The Group will address comments, if any are received from EPA, in regard to: (1) the Soil Sampling and Analysis Report, which was submitted to EPA in January 2014 to document the results from soil sampling activities at 73 residential properties in April-May 2011, September 2012, June 2013, and October 2013; (2) the Soil Sampling and Analysis Report Addendum, which was submitted to EPA in December 2015 to document the results of soil sampling performed on three residential properties Non-responsive  
[REDACTED]  
[REDACTED] in November 2015; and (3) the Soil Sampling and Analysis Report Addendum No. 2, which was submitted to EPA in September 2016 to document the results of soil sampling activities performed on three residential properties Non-responsive in August 2016.

**5. Problems Encountered, Anticipated Problems, Actual or Anticipated Delays, and Efforts Developed or Implemented to Mitigate Delays:**

- During the May 2019 operation and maintenance inspection, the Group's project coordinator observed scattered hard rubber battery case chips in the surface soil in several areas on a vacant lot on Harrison Street in Eagle Park Acres where vegetation appeared to have been recently cleared. The Group's project coordinator notified EPA about this matter on May 24, 2019 and examined the property with EPA and Illinois EPA during the November 2019 site visit. As indicated above, the Group will continue to prepare a draft outline/protocol for soil sampling on several remote fill properties, including the Harrison Street property.

**6. Modifications to Work Plans or Schedules Proposed to EPA or Approved by EPA:**

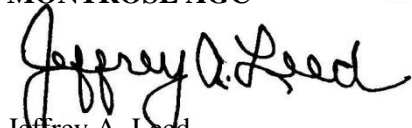
- Not applicable for this reporting period.

**7. Community Relations Activities During Previous Month or to be Undertaken During Next Six-Week Period:**

- Not applicable for this reporting period.

Should you or your staff have questions or comments regarding this progress report, please contact this office at (610) 670-7310.

Very truly yours,  
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Jeffrey A. Leed  
Project Coordinator

cc: Nicole Wood-Chi, Esq. – U.S. Environmental Protection Agency (by electronic mail)  
Christopher Grubb, Esq. – U.S. Environmental Protection Agency (by electronic mail)  
Mr. Brian Conrath - Illinois EPA (by electronic mail and first class mail)  
Mr. Tom Miller – Illinois EPA (by electronic mail)  
Technical Committee, NL Industries/Taracorp Superfund Site Group (by electronic mail)